IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation

MDL NO. 2:15-md-02641-PHX-DGC

STIPULATION OF DISMISSAL

WITHOUT PREJUDICE

This document relates to the cases listed on the Exhibit attached hereto.

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto ("Plaintiffs") and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

s/ Gregory Dalton Bentley

Gregory Dalton Bentley gbentley@zonieslaw.com ZONIES LAW LLC 1700 Lincoln St., Ste. 2400

Denver, CO 80203 P: 720.464.5300

F: 720.961.9252

ATTORNEY FOR PLAINTIFFS

s/ Richard B. North, Jr.

Richard B. North, Jr. richard.north@nelsonmullins.com NELSON MULLINS RILEY & SCARBOROUGH LLP 201 17th St. NW, Ste. 1700 Atlanta, GA 30363

P: 404.322.6000 F: 404.332.6397

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Gregory Dalton Bentley
Gregory Dalton Bentley

EXHIBIT "A"

Member Case Number	Full Name of Plaintiff	Date Answer Filed (If
		applicable)
2:18-CV-00191-DGC	Sandra Batkin	1/26/2018
2:17-cv-04567-DGC	James Burke Jr.	12/22/2017
2:19-cv-02720-DGC	Mary Daniels	5/10/2019
2:19-cv-02367-DGC	Dean Deberry	4/16/2019
2:16-cv-03274-DGC	Michael Donigan	Answer filed
2:18-cv-01304-DGC	Shirleyann Eldridge	5/4/2018
2:18-cv-00274-DGC	Loni Farfan	2/1/2018
2:16-cv-01193-DGC	Gretel Infante	4/29/2016
2:19-cv-02958-DGC	Edward Kokat	6/4/2019
2:18-cv-00199-DGC	Tara Leach	1/26/2018
2:17-cv-04278-DGC	Corona Petty	12/4/2017
2:19-cv-01809-DGC	Aundria White	4/2/2019